

# **EXHIBIT B**

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN

ESTATE OF GEORGE BERNARD  
WORRELL, JR.,

Plaintiff,

v.

THANG, INC., GEORGE CLINTON,  
SONY MUSIC ENTERTAINMENT,  
UNIVERSAL MUSIC GROUP,  
WARNER BROTHERS RECORDS,  
HDH RECORDS, WESTBOUND  
RECORDS AND SOUND  
EXCHANGE, INC.

Defendants.

Case No. 4:22 cv 11009

Hon. Shalina D. Kumar

Hon. Mag. David R. Grand

---

JAMES P. ALLEN, Sr. (P52885)  
Allen Brothers, Attorneys and Counselors, PLLC  
401 N. Main St.  
Royal Oak, MI 48067  
(313) 962-7777  
[jamesallen@allenbrotherspllc.com](mailto:jamesallen@allenbrotherspllc.com)  
Counsel for Defendants Thang, Inc. and George Clinton only

---

**INITIAL DISCLOSURES PURSUANT TO FEDRCIVP 26(a)(1)  
FOR  
DEFENDANT CLINTON AND THANG, INC**

Defendants George Clinton (“Clinton”) and Thang, Inc. (“Thang”) through their attorneys, Allen Brothers, Attorneys and Counselors, PLLC by James P. Allen, Sr. state as follows for their initial disclosures pursuant to Rule 26(a)(1):

**I. WITNESSES**

1. George Clinton (address c/o defense counsel Allen)—will testify regarding his business dealings with Plaintiff’s decedent/his representatives and the financial and legal arrangements thereof.
2. Archie Ivie (address c/o defense counsel Allen)---will testify, as an individual involved in the management of Clinton and Clinton’s various music/performing ventures, regarding the business affairs of Defendants Thang and Clinton and their interactions with Plaintiff’s decedent/his representatives.
3. Barbella Bishop (address c/o defense counsel Allen)---will testify, as an individual involved in the management of Clinton and Clinton’s various music/performing ventures, regarding the business affairs of Defendants Thang and Clinton and their interactions with Plaintiff’s decedent/his representatives.
4. Nona Hendryx (after due diligence address not immediately available)--has hired Bernie Worrell for recordings and dealt with his/his representatives’ business practices.
5. Scott Carswell (1105 E Lafayette St. Tallahassee FL)--unsuccessfully negotiated Bernie's participation on touring / recordings.
6. Nick Szatmari (21650 W Oxnard St #1460 Woodland Hills, CA 91637)--Unsuccessfully negotiated with Worrell/his representatives for tour participation.
7. Jeffrey Thinnish (1050 Wilshire Dr. Ste. 230 Troy MI 48084)--Identified to Judie Worrell where she should seek payment(s) for unpaid royalties.
8. Joel Martin (after due diligence address not immediately available) was responsible for paying publishing on behalf of Bridgeport and will be called to establish payments made to Worrell from Bridgeport and practices related to same.
9. Armen Boladian (after due diligence address not immediately available)--on information and belief is the owner and chief executive of Bridgeport Music and Westbound records who, if he truthfully testifies, can provide relevant

information about payments made to Worrell, the basis for them, and the practices of his company and the record industry.

10. Greg Reilly (after due diligence address not immediately available)--co-released recordings with George Clinton containing Worrell performances.
11. Bill Laswell (after due diligence address not immediately available) produced Worrell and Clinton-affiliated groups and can testify about the compensation paid arrangements for musicians.
12. Vivian Scott-Chew (after due diligence address not immediately available)--negotiated Worrell's participation in the Sony project.
13. William Collins (after due diligence address not immediately available) can provide testimony about the rates for which Worrell periodically performed and his business dealings.
14. David Byrne (after due diligence address not immediately available)--Produced Talking Heads and used Bernie without paying artist royalties.
15. Shoshana Zisk (after due diligence address not immediately available)—can provide testimony about efforts to negotiate Worrell's services.
16. George Leitner (after due diligence address not immediately available)---can provide testimony about Worrell's business dealings, demands for compensation, and having to cancel a tour due to same.
17. Custodian of Records/30(b)(6) representative for any party or company paying/owing royalties to any other party.
18. Custodian of Records/30(B)(6) representative of Malbiz Music to testify about royalties paid to Worrell.
19. Custodian of Records/30(b)(6) representative of Herzog and Straws auditors to testify regarding audit of royalty payments to Worrell performed in 1979.
20. Theodore H. Friedman (110 East 59<sup>th</sup> Street, Suite 3202 NY, NY 10022)—Special master appointed by Central Dist of CA to distribute royalties by court supervised formula.
21. Custodian of Records Internal Revenue Service
22. Custodian of Records Whatcom County, Washington
23. Custodian of Records/30(b)(6) representative United States Copyright Office to testify about copyright filings related to this case as well as practices of the office.
24. Custodian of Records Casablanca Records/30(b)(6) representative (or successor thereto) to testify about the dealings the company had with Clinton and Worrell.
25. Richard S. Busch (1999 Avenue of the Stars, Suite 1100 Century City, CA 90067 (424-253-1255) Plaintiff's attorney in prior NY action can provide testimony on when he knew the putative Thang-Worrell agreement of 1/1/76 was not signed by the party to be charged (i.e., Thang).

26. Custodians of Records/30(b)(6) representatives for United Sound Studios, Tera Shirma and Artie Fields Studios referenced in paragraph 33 of Plaintiff's Complaint to testify about the allegations in Plaintiff's complaint.
27. Defendants' efforts to ascertain addresses of identified witnesses is ongoing as are Defendants' efforts to discern relevant witnesses as Plaintiff's claims become clearer through the process of discovery. Defendants' reserve all rights to amend this disclosure.

## **II. DOCUMENTS**

See Spreadsheet Attached as Exhibit A.

## **III. DAMAGES**

Defendants Thang and Clinton contend that they have caused Plaintiff no damages.

## **IV. INSURANCE**

Defendants have no insurance coverage applicable to the allegations set forth in the Complaint herein.

Defendants reserve the right to amend this Rule 26 disclosure as more information about Plaintiff's claims becomes available.

Respectfully submitted,

September 23, 2022

ALLEN BROTHERS, PLLC

/s/JAMES P. ALLEN, SR

James P. Allen, Sr. (P52885)

Attorney for Clinton and Thang, Inc.

401 N. Main Street

Royal Oak, MI 48067

(313) 962-7777

[jamesallen@allenbrotherspllc.com](mailto:jamesallen@allenbrotherspllc.com)

## **CERTIFICATE OF SERVICE**

I hereby certify that on September 23, 2022, I electronically delivered the foregoing paper to the following attorneys of record:

Daniel D. Quick  
[dquick@dickinsonwright.com](mailto:dquick@dickinsonwright.com)

/s/Veronica Durr  
401 N. Main Street  
Royal Oak, MI 48067  
(313) 962-7777  
[vdurr@allenbrotherspllc.com](mailto:vdurr@allenbrotherspllc.com)

# EXHIBIT A

	A		B		C	
	CATEGORY		DESCRIPTION		LOCATION	
1						
2						
3	Legal Correspondence		Attorney M. Rangel.	July 1982		C/O Defense Counsel
4	Invoicing		Paramount Recording May 1979			C/O Defense Counsel
5	Legal Correspondence		Paul Schindler	3-20-81		C/O Defense Counsel
6	Legal Correspondence		Paul Schindler	2-27-81		C/O Defense Counsel
7	Handwritten Promise to Pay \$50,000		N. Montez A. Ivie.	1-30-81		C/O Defense Counsel
8	Casablanca check stub			12-30-80		C/O Defense Counsel
9	Legal Correspondence		Paul Schindler	12-29-80		C/O Defense Counsel
10	Check Stub Uncle Jam Records			11-21-80		C/O Defense Counsel
11	Legal Correspondence		Michael Rosenfeld undated to Edward Greer re: proposed agreement			C/O Defense Counsel
12	Legal Correspondence		Emily Slenkin 12-10-80 w/attached Schedules of Royalty Payments in 1979 and 1980			C/O Defense Counsel
13	Agreement re: advance and drafts of the same		12-23-80. Casablanca and various Clinton Entities			C/O Defense Counsel
14	Undated handwritten ledger for Jan 79 to Sep 80 payments from Thang to Worrell		Details of payments unknown author; 2 pages; 40 numbered lines; 13 columns			C/O Defense Counsel
15	Malbiz Music Royalty Statements		Period June 30, 1979 for Bernie Worrell by Track 2/handwritten page containing additional calculations from unknown author			C/O Defense Counsel
16	Malbiz Music Royalty Statements		Period 12/78 for Bernie Worrell by Track			C/O Defense Counsel
17	Malbiz Music Advance Schedule		For Bernie Worrell unknown Author Purported Advances in 1978			C/O Defense Counsel
18	Malbiz Music Royalty Statements		Period Year End 1976 for Bernie Worrell by Track			C/O Defense Counsel
19	Royalty Statement		Period ending 6-30-79 For Bernie Worrell by Track			C/O Defense Counsel
20	Western Union Money Order Receipt		\$1200. Thang Inc. to Bernie or Judy Worrell. illegible date and time			C/O Defense Counsel
21	One Page containing 4 handwritten receipts		From Thang to Worrell for Session & Royalty advances in 1977 and 1979			C/O Defense Counsel
22	Royalty Statement		Period ending 12-31-79 for Bernie Worrell by Track			C/O Defense Counsel
23	One Page containing 4 handwritten receipts		From Thang to Worrell for Royalty Advances			C/O Defense Counsel
24	Western Union Money Order Receipt		To Bernie Worrell for \$2000 "Date illegible"			C/O Defense Counsel
25	Audit Report Herzog and Straws		To December 31, 1979			C/O Defense Counsel
26	Verified Complaint Worrell v Thang, Clinton, Malbiz Music, Inc., 12-4-1981		Index/Case No. 06238/82. Supreme Court State of New York County			C/O Defense Counsel
27	Correspondence 12-17-92 [Note: Subj to protective order in Tercer Mundo v Boladian, et al, 92-cv-2685R & 93-cv-4106R. USDC CDCA]		Jane Peterer to Steven Saporta re: Royalty payments to Bernie Worrell			C/O Defense Counsel
28	Special Master Report from Special Master Theodore H. Friedman dated 12-5-96 in Tercer Mundo v Boladian, et al		38 page report specifying court-supervised distributions of Royalties between Clinton, Worrell and others by Track.			C/O Defense Counsel
29	Email Exchange between Charles Ball and Judy Worrell		Dated May 16, 2011 re: reunion performances and financial dispute between Worrell and Clinton			C/O Defense Counsel
30	Plaintiff's Memorandum of Law in Opposition to Defendant's Motion to Dismiss First Amended Complaint		Worrell v Thang & Clinton, NYSC Index No 652872/2019 dated 8-17-2020			C/O Defense Counsel